KÜRT ABRON#K-82005 CSP-SOLANO BLDG# 21-J-6-U P.O. BOX 4000 VACAVILLE, CA 95696-4000

In Pro. Per.



## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

KURT ABRON

Petitioner E-filing

CV 08

2857

D.K. SISTO, Warden Respondent MOTION AND DECLARATION FOR APPOINTMENT OF COUNSEL

Petitioner Kurt Abron, moves this Court for an order to appoint Counsel at public expense. 28 U.S.C. §§1915(e)(1), 2254(h); 18 U.S.C. §3006A.

Counsel should be appointed because the issues in this case are particulaty complex.

- (1.) The BPT's ever changing criteria on assessing suitability.
- (2.) Investigative action is needed that the Petitioner is un-(able) to do, regarding PC 190, as well as Prop 7, and the proper intent of the Law.
- (3.) Review and outline the BPT's Matrix, now that recent U.S. Supreme Court rulings in Blakely and Cunningham establish that any additional time, must be given by a Jury.

I declare under penalty of perjury that the foregoing is true and correct and that this declartion was executed at Vacaville, Ca, on June 3, 2008.

DATED June 3, 2008

Kurt F. Abron

Kut 7. Alren

Page 1 of 1

TO THE CLERK OF THE UNITED STATES DISTRICT COURT OF THE NORTHERN DISTRICT OF CALIFORNIA 450 GOLDEN GATE AVENUE SAN FRANCISCO, CA 94102

BLDG#21-J-6-U P.O. BOX 4000 VACAVILLE, CA 95696-4000

KURT ABRON#K-82005

California etgia etison - Solano